

CHAD E. MEACHAM  
UNITED STATES ATTORNEY  
Donna K. Webb  
Assistant United States Attorney  
State Bar No. 21024000  
1100 Commerce St., Ste. 300  
Dallas, Texas 75242  
Telephone: 214-659-8600  
Facsimile: 214-659-8807  
Email: [donna.webb@usdoj.gov](mailto:donna.webb@usdoj.gov)  
Attorneys for Department of Education

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

IN RE:

DANIEL JOSEPH WOOLLEY and  
MONICA RENEE WOOLLEY,

Debtors

DANIEL JOSEPH WOOLLEY and  
MONICA RENEE WOOLLEY,

Plaintiffs,

v.

NAVIENT, UNITED STATES  
DEPARTMENT OF EDUCATION,  
And AIDVANTAGE

Defendants.

Case Number: 21-42917-MXM-7

(Chapter 7)

Adv. No. 22-04017-MXM

**UNITED STATES OF AMERICA'S ANSWER TO  
PLAINTIFFS' COMPLAINT FOR HARDSHIP DISCHARGE OF A STUDENT  
LOAN DEBT PURSUANT TO 11 U.S.C. § 523(a)(8)**

**TO THE UNITED STATES BANKRUPTCY JUDGE:**

The United States of America (United States), United States Department of Education (Education), by and through the United States Attorney for the Northern District of Texas, denies that the repayment of the student loans to Education cause Plaintiffs an undue hardship.

The United States admits Plaintiffs are the debtors in this Chapter 7 bankruptcy. The United States does not have sufficient information and knowledge to admit or deny the remaining allegations contained in the Introduction, therefore, they are denied.

The United States admits to the jurisdiction of this Court, that this is a core proceeding, and venue is proper in this district.

The United States admits it is the holder and owner of student loan indebtedness owed by Plaintiffs.

The United States admits Plaintiff's filed for relief under Chapter 7 as alleged under Factual Allegations paragraph 4.

The United States does not have sufficient information and knowledge to admit or deny the allegations contained under Factual Allegations paragraph 5, therefore, they are denied.

The United States does not have sufficient information and knowledge to admit or deny the allegations contained under Factual Allegations paragraph 6, therefore, they are denied.

The United States does not have sufficient information and knowledge to admit or deny the allegations contained under Factual Allegations paragraph 7, therefore, they are denied.

The United States does not have sufficient information and knowledge to admit or deny the allegations contained under Factual Allegations paragraph 8, therefore, they are denied.

The United States admits Plaintiffs owe a total indebtedness to Education in the amount of \$111,998.03 as of April 2, 2022.

The United States admits ten loans were made to Plaintiffs from 8/17/2015 through 10/8/2020 under the William D. Ford Federal Direct Loan Program. The United States admits all the loans are Parent Plus loans.

The United States does not have sufficient information and knowledge to admit or deny the allegation contained under Causes of Action paragraph 9, therefore, it is denied.

The United States does not have sufficient information and knowledge to admit or deny the allegations contained under Causes of Action paragraph 10, therefore, they are denied.

The United States does not have sufficient information and knowledge to admit or deny the allegations contained under Causes of Action paragraph 11, therefore, they are denied.

The United States does not have sufficient information and knowledge to admit or deny the allegations contained under Causes of Action paragraph 12, therefore, they are denied.

The United States admits Plaintiffs have failed to make any payments on the loans with Education.

The United States denies the student loans owed to Education are dischargeable.

The United States respectfully requests this Court to enter an order denying any relief to Plaintiff concerning the indebtedness owed to Education and for such further and other relief it may be entitled.

Respectfully submitted,

CHAD E. MEACHAM  
UNITED STATES ATTORNEY

/s/ Donna K. Webb  
Donna K. Webb  
Assistant United States Attorney  
State Bar No. 21024000  
1100 Commerce St., Ste 300  
Dallas, Texas 75242  
donna.webb@usdoj.gov  
Telephone: 214-659-8600  
Facsimile: 214-659-8807  
Attorneys for Education

### **CERTIFICATE OF SERVICE**

I certify that on April 20, 2022, I electronically submitted the foregoing document with the clerk of court for the U.S. Bankruptcy Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Donna K. Webb  
Donna K. Webb  
Assistant United States Attorney